

EXHIBIT B

RICHARDSON: BRIAN KEITH INGRAM

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

DR. GEORGE RICHARDSON;)
ROSALIE WEISFELD; AUSTIN JUSTICE)
COALITION; COALITION OF TEXANS)
WITH DISABILITIES; MOVE TEXAS)
CIVIC FUND; LEAGUE OF WOMEN)
VOTERS OF TEXAS; and AMERICAN GI)
FORUM OF TEXAS, INC.,)

Plaintiffs,)

v.)

TEXAS SECRETARY OF STATE; TRUDY)
HANCOCK, in her official)
capacity as BRAZOS COUNTY)
ELECTIONS ADMINISTRATOR; and)
PERLA LARA, in her official)
capacity as CITY OF McALLEN,)
TEXAS, SECRETARY,)

Defendants.)

Civil Case No.
5:19-cv-00963-OLG

**CERTIFIED
TRANSCRIPT**

REMOTE VIDEOTAPED DEPOSITION OF
BRIAN KEITH INGRAM
May 11, 2020

REMOTE VIDEOTAPED DEPOSITION OF BRIAN KEITH
INGRAM, produced as a witness at the instance of
the Plaintiffs, and duly sworn, was taken in the
above-styled and numbered cause on May 11, 2020,
from 9:32 a.m. to 12:38 p.m., remotely before
Rebecca A. Graziano, CSR, RPR, CRR, in and for the
State of Texas, reported by machine shorthand,
pursuant to the Federal Rules of Civil Procedure
and the provisions stated on the record.

1 the changes for those.

13 Q Okay. And are local elections officials
14 required to use these forms?

15 A So some yes, some no. Mostly -- mostly
16 they're not required, and if they want to modify
17 it, they send the modification list to us to
18 review and see if it complies with the law. So
19 they can do that with any of the forms, modify
20 them and get it -- get it approved by our office.

21 Applications for ballot-by-mail do not
22 have to follow any particular form. Those
23 are -- those can be handwritten. They can do
24 anything. They just have to have the required
25 material, and they do not need prior approval for